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October 8, 2021

VIA ECF

Judge Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
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In re: *United States v. Encarnacion-Velez et al. (on behalf of Leuris Manuel Sabala-Mejia)*, 21-CR-225

Dear Judge Vyskocil:

I write to request a modification of Mr. Sabala-Mejia's curfew. Currently he is on a curfew, from 8:00am to 6:00pm. I write to request that the Court modify his curfew, from 7:30am to 8:00pm. Both his pretrial officer and the AUSA consent to this modification.

Mr. Sabala-Mejia has sole physical custody of his young children, who are 12 and 13 years old. They are in school, and Mr. Sabala-Mejia, as a single father, takes them to school and picks them up. Currently they have been late every day because of Mr. Sabala-Mejia's curfew restriction. If he were allowed to leave his home at 7:30am, he could get his children to school on time.

Also, his children have after school tutoring, and extra-curricular activities, that extend past his curfew. I have asked his pretrial officer what conditions would be most conducive to him being able to meet the needs of his children, and she suggested extending his curfew. Mr. Sabala-Mejia has been fully compliant with all conditions to date.

I understand the Court stated in its last modification order that no other modifications would be granted. However, this first request was made in the summer, when his children's school schedules were not yet known. Now that in-person school has resumed, Mr. Sabala-Mejia asks for the Court's reconsideration so that his children may be able to resume their necessary activities.

Thank you for your understanding of Mr. Sabala-Mejia's challenges as a single father, and consideration of this request.

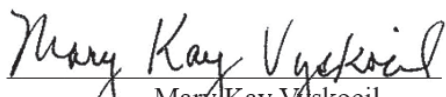
This request is GRANTED IN PART and DENIED IN PART. Defendant shall observe a curfew from 6 PM to 7:30 AM. He may leave home confinement between the hours of 7:30 AM and 6 PM without pre-clearance from Pretrial Services. His travel shall remain restricted to SDNY/EDNY. He should not expect further modifications of the conditions of release.

Sincerely,



Susan K. Marcus, Esq.
Attorney for Leuris Manuel Sabala-Mejia

Date: October 12, 2021
New York, New York



Mary Kay Vyskocil
United States District Judge